

# Richard W. Grime

## Partner

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T: +1 202.955.8219

Washington, D.C.

Richard W. Grime is a litigation partner in Gibson, Dunn & Crutcher's Washington, D.C. office and a member of the White Collar Defense and Investigations Practice Group.

Mr. Grime's practice focuses on representing companies and individuals in a full range of corruption, accounting fraud, and securities enforcement matters before the Securities and Exchange Commission and the Department of Justice. Mr. Grime also conducts internal investigations and counsels clients on compliance and corporate governance matters.

Mr. Grime is ranked nationally by *Chambers USA* as a leading attorney in FCPA and Securities Regulation: Enforcement. He is described as "top notch – smart, practical and a very good lawyer" with "great insight into regulators' views." He is also ranked by *Chambers Global* as a leading attorney in FCPA and was recently selected by his peers for inclusion in *The Best Lawyers in America*©2016 – 2024 in the field of Criminal Defense: White Collar, and Securities Regulation. Mr. Grime is recognized in *Who's Who Legal's* inaugural 2024 *Thought Leaders: USA* guide in the area of Investigations, and Business Crime Defence – Corporates. The publication also recognized him in its *Thought Leaders-Global Investigations, Business Crime Defence Global, and Investigations* guides for 2022 and 2024. Mr. Grime was recognized as one of the 3000 "Leading Lawyers in America" in *Lawdragon Magazine* 2011. He is also a longstanding and frequent speaker to legal and industry practitioners particularly on anti-corruption and securities enforcement topics.

Prior to joining Gibson Dunn, Mr. Grime spent over nine years in the Division of Enforcement at the Securities and Exchange Commission in Washington, DC. In his last four years at the Commission he was an Assistant Director. While at the SEC, Mr. Grime supervised the filing of over 70 enforcement actions covering a wide range of the Commission's activities. These included a series of FCPA cases, numerous accounting fraud cases involving retail, technology and financial services companies, regulated entity cases involving broker-dealers, transfer agents and investment advisers, along with multiple insider trading and Ponzi-scheme enforcement actions.

Mr. Grime received his law degree with First Class Honors from Oxford University in 1986 and qualified as a solicitor in London. After practicing in London, and before joining the SEC, Mr. Grime was a litigator for 10 years in Los Angeles and Washington DC.

### Representative Matters

- Represented a major mining company in litigation with the SEC regarding alleged accounting fraud.
- Represented an engineering company relating to potential corruption issues before the SEC and DOJ.
- Represented a major bank relating to potential corruption issues before the SEC



### Capabilities

White Collar Defense and Investigations  
Anti-Corruption & FCPA  
Crisis Management  
Fintech and Digital Assets  
International Trade  
Litigation  
Privacy, Cybersecurity, and Data Innovation  
Securities Enforcement  
Securities Litigation  
Securities Regulation and Corporate Governance

### Credentials

#### Education

University of Oxford - 1986 Bachelors (First Class Hons)

#### Admissions

District of Columbia Bar

and DOJ.

- Represented a technology company in an accounting fraud investigation before the SEC.
- Represented independent directors in accounting fraud investigation before the SEC.
- Represented the audit committee of the board of directors of a U.S. gaming company relating to allegations of FCPA violations in an investigation conducted by the SEC and DOJ.
- Represented an oil exploration company relating to allegations of FCPA violations in an investigation conducted by the SEC and DOJ.
- Represented multiple senior executives in FCPA investigations conducted by the DOJ and SEC covering the oil exploration, airline, consumer products, financial services, and beverage industries.
- Represented a publicly traded agricultural company in an investigation of potential corruption issues in Australia.
- Assisted monitor in compliance reviews of two companies arising from two separate enforcement actions brought by the SEC and the World Bank.
- Advised a private equity firm on insider trading issues.
- Represented a broker-dealer in investigation conducted by FINRA regarding the protection of customer information.
- Represented a major bank in auction rate securities investigation before the SEC and other government agencies.
- Represented senior officers in SEC settlements of alleged FCPA violations.
- Represented multiple senior executives in FCPA and insider trading investigations.
- Obtained declinations from DOJ and SEC for multiple companies and individuals regarding FCPA and other corruption issues.
- Advised numerous companies regarding the creation, refinement and implementation of anti-corruption programs.

#### **Selected Speaking Engagements and Publications**

- Co-Chair “The Foreign Corrupt Practices Act and International Anti-Corruption Developments,” Practising Law Institute (2011-present).
- Presenter, “Enhancing Internal Controls: Identifying and Addressing Deficiencies and Tailoring Controls to Your Risk Environment” and “Predictions from Former Prosecutors: What Enforcement, Bribery Schemes and Compliance will Look like in 2020 and Beyond” 15th Annual TRACE Forum, March 7, 2019.
- Co-Presenter, “Whistleblower Complaints and Interviews — Supporting Internal Whistleblowing Post-*Digital Realty v. Somers*” ACI’s 35th International Conference on the Foreign Corrupt Practices Act – November 28 – 29, 2018.
- Co-Presenter, “Bribery and Corruption Issues for Financial Institutions,” SIFMA Legal and Compliance Conference (2009-2016).
- Co-Presenter, “Legal Hot Button FCPA Issues Affecting Global Anti-Corruption Programs,” FCPA Boot Camp, American Conference Institute (2015).
- Co-Presenter, “An Interactive Moot Court Debate on Unsettled FCPA Issues” 31st International Conference on FCPA, American Conference Institute (2014).
- Co-Presenter, “Hedge and Private Fund Enforcement & Regulatory Developments,” Practising Law Institute (2014).
- Co-Author, “Caveat Emptor: Anti-Corruption Challenges and Compliance Strategies for Private Equity,” (2014).

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- Co-Presenter, “WACCA Global Issues Forum: Detecting Red Flags When Dealing with Foreign Officials,” WACCA (2013).
- Co-Author, “What’s In Your Private Equity Portfolio? Not Knowing Could Result In Increased Risk of Violating The UK Bribery Act and the Foreign Corrupt Practices Act,” Practising Law Institute (2012).
- Co-Author, “Implications of the U.K. Bribery Bill for Individuals and Corporations Already Subject to the FCPA,” (2010).
- Co-Author, “Disgorgement of Profits in FCPA Enforcement Actions — Seeking a Rational Basis,” Practising Law Institute (2010).
- Co-Author, “Why the Accounting Provisions of the Foreign Corrupt Practices Act Should Concern You,” 23rd Annual National Institute on White Collar Crime (2009).
- Co-Author, “Conducting Anticorruption Due Diligence in M&A Deals,” China Business Review (2009).
- Co-Presenter, “Remediation Programs: How to Clean Up After an FCPA Investigation or Penalty, and When to Start,” 22nd National Forum on FCPA, American Conference Institute (2009).
- Co-Presenter, “Complying with the FCPA In a Heightened Enforcement Environment – What Advice You Need to Give Your Clients & When.” New York City Bar (2009).
- Co-Presenter, “Key Issues Facing Boards of Directors: International Business Regulation and Enforcement,” Directors Roundtable Panel (2009).
- Co-Presenter, “Designing Effective Internal Accounting Controls to Meet FCPA’s Books and Records Provision,” C5 Group and American Conference Institute’s India Summit on Anti-Corruption Compliance and Enforcement. (2009)
- Interviewed, PBS FRONTLINE/World: Interviewed for Documentary “Black Money” (aired April 7, 2009; see <http://www.pbs.org/wgbh/pages/frontline/blackmoney/>)
- Interviewed, “Discussion of FCPA Compliance Matters,” Bloomberg TV interview by Catherine Yang (May 30, 2008)
- Co-Presenter, “The Foreign Corrupt Practices Act 2009: Coping with Heightened Enforcement Risks,” Practising Law Institute (2009).
- Co-Presenter, “Identifying and Correcting Books and Records Violations,” American Conference Institute’s FCPA and International Anti-Corruption Conference for the Pharmaceutical and Medical Device Industries (2009).
- Co-Presenter, “The Reality of Having a Special Compliance Monitor: Setting the Boundaries and Making the Relationship Work,” 21st National Conference on Foreign Corrupt Practices Act, American Conference Institute (2009).
- Co-Presenter, “FCPA: Complying and Implementing Risk Management Strategies,” New York City Bar (2008).
- Co-Presenter, “Second Annual European Forum on Anti-Corruption,” American Conference Institute (2008).
- Co-Author, “Expanding Boundaries: FCPA Jurisdiction Over Foreign Entities and Individuals,” Criminal Litigation (Vol. 9, No. 1, 2008).
- Co-Author, Obvious and Not-So-Obvious Consequences from the Rise in FCPA Enforcement, 22nd Annual National Institute on White Collar Crime (2008).
- Co-Presenter, “Waiver vs. Protection of Attorney-Client Privilege: Ensuring a Deliberate Approach,” American Conference Institute’s Sixth National Forum on Conducting, Managing and Responding to Corporate Investigations (2008).
- Co-Presenter, “The Foreign Corrupt Practices Act: Developing a Compliance Program,” West Legalworks (2008).

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- Co-Presenter, “Practical Guide to the Foreign Corrupt Practices Act,” The District of Columbia Bar (2008).
- Co-Presenter, “The Nuts and Bolts of Conducting an Internal Investigation,” Foreign Corrupt Practices Act 2008: Coping with Heightened Enforcement Risks” Practising Law Institute (2008).
- Co-Presenter, “Voluntary Disclosures: How the Government Evaluates Them and What to Include,” 19th National Conference on the Foreign Corrupt Practices Act, American Conference Institute (2008).
- Co-Presenter, “The Foreign Corrupt Practices Act at 30 Years,” 22nd Annual National Institute on White Collar Crime, American Bar Association (2008).
- Co-Presenter, “Insider Trading Issues,” Hedge Fund Enforcement Issues and Regulatory Developments 2007, Practising Law Institute (2007).
- Co-Presenter, “Voluntary Disclosures: How the Government Evaluates Them and What to Include” 18th National Conference on the Foreign Corrupt Practices Act, American Conference Institute (2007).
- Co-Presenter, “Lessons Learned from Recent DOJ and SEC Enforcement Actions,” “Doing Business Under the Foreign Corrupt Practices Act,” New York City Bar (2007).
- Co-Presenter, “Roundtable of Hypothetical Cases with Enforcement Officials and Defense Counsel,” The Practising Law Institute (2007).
- Co-Author, “Voluntary Disclosure — Evaluating the Benefits and Burdens.” 18th National Conference Foreign Corrupt Practices Act, American Conference Institute (2007).

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